

[Parties and Counsel Listed on Signature Page]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR-PHK

**JOINT STATUS REPORT ON THE  
TIKTOK DEFENDANTS' 30(B)(6)  
WITNESS SAMANTHA KERSUL  
SEARCH TERMS**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

This Document Relates to:

ALL ACTIONS

1 Pursuant to the Court's Order resolving Plaintiffs' motion compel the TikTok Defendants  
2 to produce the custodial file of Rule 30(b)(6) witness Samantha Kersul (Dkt. 2327), Plaintiffs and  
3 the TikTok Defendants (collectively, "the Parties") jointly submit this second report on the status  
4 of the Parties' negotiations concerning a reasonable subset of search terms.

5 Consistent with the Court's instruction, the Parties met and conferred via videoconference  
6 on October 27 and again on October 30, 2025, to discuss a proposed set of search terms, which  
7 Plaintiffs proposed on October 23 and to which the TikTok Defendants responded on October 29.  
8 The Parties have since exchanged numerous compromise proposals and on November 19, 2025,  
9 the parties reached agreement on a final set of search terms.

10  
11 Dated: November 19, 2025

12 Respectfully submitted,

13 /s/ Felicia Craick

14 FELICIA CRAICK  
15 **KELLER ROHRBACK LLP**  
16 1201 THIRD AVENUE, SUITE 3400  
17 SEATTLE, WA 98101  
18 Telephone: 206-623-1900  
19 fcraick@kellerrohrback.com

20 RON AUSTIN  
21 **RON AUSTIN LAW**  
22 400 MANHATTAN BLVD.  
23 HARVEY, LA 70058  
24 Telephone: 504-227-8100  
25 raustin@ronaustinlaw.com

26 AELISH M. BAIG  
27 **ROBBINS GELLER RUDMAN & DOWD LLP**  
28 1 MONTGOMERY STREET, #1800  
SAN FRANCISCO, CA 94104  
Telephone: 415-288-4545  
AelishB@rgrd.com

PAIGE BOLDT  
**ANAPOL WEISS**  
130 N. 18TH STREET, #1600  
PHILADELPHIA, PA 19103  
Telephone: 215-929-8822

1 pboldt@anapolweiss.com

2 THOMAS P. CARTMELL  
3 **WAGSTAFF & CARTMELL LLP**  
4 4740 Grand Avenue, Suite 300  
5 Kansas City, MO 64112  
6 Telephone: 816-701-1100  
7 tcartmell@wcllp.com

8 SARAH EMERY  
9 **HENDY JOHNSON VAUGHN EMERY PSC**  
10 600 WEST MAIN STREET, SUITE 100  
11 LOUISVILLE, KT 40202  
12 Telephone: 859-600-6725  
13 semery@justicestartshere.com

14 KIRK GOZA  
15 **GOZA HONNOLD**  
16 9500 NALL AVE. #400  
17 OVERLAND PARK, KS 66207  
18 Telephone: 913-412-2964  
19 Kgoza @gohonlaw.com

20 RONALD E. JOHNSON, JR.  
21 **HENDY JOHNSON VAUGHN EMERY PSC**  
22 600 WEST MAIN STREET, SUITE 100  
23 LOUISVILLE, KT 40202  
24 Telephone: 859-578-4444  
25 rjohnson@justicestartshere.com

26 MATTHEW P. LEGG  
27 **BROCKSTEDT MANDALAS FEDERICO, LLC**  
28 2850 QUARRY LAKE DRIVE, SUITE 220  
BALTIMORE, MD 21209  
Telephone: 410-421-7777  
mlegg@lawbmf.com

SIN-TING MARY LIU  
**AYLSTOCK WITKIN KREIS & OVERHOLTZ,  
PLLC**  
17 EAST MAIN STREET, SUITE 200  
PENSACOLA, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

JAMES MARSH  
**MARSH LAW FIRM PLLC**  
31 HUDSON YARDS, 11TH FLOOR

NEW YORK, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

JOSEPH H. MELTER  
**KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
jmeltzer@ktmc.com

HILLARY NAPPI  
**HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212-213-8311  
hnappi@hrsclaw.com

EMMIE PAULOS  
**LEVIN PAPANTONIO RAFFERTY**  
316 SOUTH BAYLEN STREET, SUITE 600  
PENSACOLA, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

RUTH RIZKALLA  
**THE CARLSON LAW FIRM, PC**  
1500 ROSECRANS AVE., STE. 500  
MANHATTAN BEACH, CA 90266 Telephone:  
415-308-1915 rrizkalla@carlsonattorneys.com

ROLAND TELLIS  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: 818-839-2333  
rtellis@baronbudd.com

DIANDRA "FU" DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20th St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205-855-5700  
fu@dicellolevitt.com

*Plaintiffs' Steering Committee Membership*

1 **LEXI J. HAZAM LIEFF CABRASER**  
2 **HEIMANN & BERNSTEIN, LLP**  
3 275 BATTERY STREET, 29TH FLOOR  
4 SAN FRANCISCO, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

5 **PREVIN WARREN**  
6 **MOTLEY RICE LLC**  
7 401 9th Street NW Suite 630  
8 Washington DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

9 *Co-Lead Counsel*

10 **CHRISTOPHER A. SEEGER**  
11 **SEEGER WEISS, LLP**  
12 55 CHALLENGER ROAD, 6TH FLOOR  
13 RIDGEFIELD PARK, NJ 07660  
Telephone: 973-639-9100  
cseeger@seegerweiss.com

14 *Counsel to Co-Lead Counsel and Settlement Counsel*

15 **JENNIE LEE ANDERSON**  
16 **ANDRUS ANDERSON, LLP**  
17 155 MONTGOMERY STREET, SUITE 900  
18 SAN FRANCISCO, CA 94104  
Telephone: 415-986-1400  
jennie@andrusanderson.com

19 *Liaison Counsel and Ombudsperson*

20 **MATTHEW BERGMAN**  
21 **SOCIAL MEDIA VICTIMS LAW CENTER**  
22 821 SECOND AVENUE, SUITE 2100  
23 SEATTLE, WA 98104  
Telephone: 206-741-4862  
matt@socialmediavictims.org

24 **JAMES J. BILSBORROW**  
25 **WEITZ & LUXENBERG, PC**  
26 700 BROADWAY  
27 NEW YORK, NY 10003  
Telephone: 212-558-5500  
jbilsborrow@weitzlux.com

1 ELLYN HURD  
2 **SIMMONS HANLY CONROY, LLC**  
3 112 MADISON AVE, 7TH FLOOR  
4 NEW YORK, NY 10016  
Telephone: 212-257-8482  
ehurd@simmonsfirm.com

5 ANDRE MURA  
6 **GIBBS LAW GROUP, LLP**  
7 1111 BROADWAY, SUITE 2100  
8 OAKLAND, CA 94607  
Telephone: 510-350-9717  
amm@classlawgroup.com

9 MICHAEL M. WEINKOWITZ  
10 **LEVIN SEDRAN & BERMAN, LLP**  
11 510 WALNUT STREET  
12 SUITE 500  
13 PHILADELPHIA, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

14 MELISSA YEATES  
15 **KESSLER TOPAZ MELTZER & CHECK LLP**  
16 280 KING OF PRUSSIA ROAD  
17 RADNOR, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com

18 *Plaintiffs' Steering Committee Leadership*

19 JOSEPH VANZANDT  
20 **BEASLEY ALLEN**  
21 234 COMMERCE STREET MONTGOMERY, LA  
22 36103 Telephone: 334-269-2343  
joseph.vanzandt@beasleyallen.com

23 *Federal/State Liaison*

24 *Attorneys for Plaintiffs*

25 **KING & SPALDING LLP**

26 /s/ Geoffrey M. Drake

27 Geoffrey M. Drake, *pro hac vice*

28 TaCara D. Harris, *pro hac vice*

KING & SPALDING LLP

1 1180 Peachtree Street, NE, Suite 1600  
2 Atlanta, GA 30309-3521  
3 Telephone: (404) 572-4600  
4 Facsimile: (404) 572-5100  
5 Email: gdrake@kslaw.com  
6 tharris@kslaw.com

7 David P. Mattern, *pro hac vice*  
8 KING & SPALDING LLP  
9 1700 Pennsylvania Avenue, NW, Suite 900  
10 Washington, DC 20006-4707  
11 Telephone: (202) 737-0500  
12 Facsimile: (202) 626-3737  
13 Email: dmattern@kslaw.com

14 Bailey J. Langner (SBN 307753)  
15 KING & SPALDING LLP  
16 50 California Street, Suite 3300  
17 San Francisco, CA 94111  
18 Telephone: (415) 318-1200  
19 Facsimile: (415) 318-1300  
20 Email: blangner@kslaw.com

21 *Attorneys for Defendants*  
22 *TikTok Inc., ByteDance Inc., TikTok Ltd.,*  
23 *ByteDance Ltd., and TikTok LLC*  
24  
25  
26  
27  
28

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Felicia Craick, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of November, 2025, at Seattle, Washington.

/s/ Felicia Craick

Felicia Craick



**CERTIFICATE OF SERVICE**

I, Sarah Skaggs, hereby certify that on November 19, 2025, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Sarah Skaggs

Sarah Skaggs